

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
AURELIUS CAPITAL PARTNERS, LP
and AURELIUS CAPITAL MASTER, LTD.,

Plaintiffs,

- against -

THE REPUBLIC OF ARGENTINA,

Defendant.

No. 07 Civ. 2715 (TPG)

-----X
AURELIUS CAPITAL PARTNERS, LP
and AURELIUS CAPITAL MASTER, LTD.,

Plaintiffs,

- against -

THE REPUBLIC OF ARGENTINA,

Defendant.

No. 07 Civ. 11327 (TPG)

-----X
BLUE ANGEL CAPITAL I LLC,

Plaintiff,

- against -

THE REPUBLIC OF ARGENTINA,

Defendant.

No. 07 Civ. 2693 (TPG)

-----X : *(Captions continue on following pages)*

**NOTICE OF PLAINTIFFS' MOTION FOR
EXPEDITED DISCOVERY FROM THE REPUBLIC
AND BCRA**

-----X :
AURELIUS CAPITAL MASTER, LTD. and :
ACP MASTER, LTD., :
 : No. 09 Civ. 8757 (TPG)
Plaintiffs, :
 :
- against - :
 :
THE REPUBLIC OF ARGENTINA, :
 :
Defendant. :
-----X :

-----X :
AURELIUS CAPITAL MASTER, LTD. and :
ACP MASTER, LTD., :
 : No. 09 Civ. 10620 (TPG)
Plaintiffs, :
 :
- against - :
 :
THE REPUBLIC OF ARGENTINA, :
 :
Defendant. :
-----X :

-----X :
AURELIUS OPPORTUNITIES FUND II, LLC :
and AURELIUS CAPITAL MASTER, LTD., :
 : No. 10 Civ. 1602 (TPG)
Plaintiffs, :
 :
- against - :
 :
THE REPUBLIC OF ARGENTINA, :
 :
Defendant. :
-----X :

-----X :	
AURELIUS OPPORTUNITIES FUND II, LLC	:
and AURELIUS CAPITAL MASTER, LTD.,	:
	No. 10 Civ. 3507 (TPG)
Plaintiffs,	:
	:
- against -	:
	:
THE REPUBLIC OF ARGENTINA,	:
	:
Defendant.	:
-----X :	
AURELIUS CAPITAL MASTER, LTD. and	:
AURELIUS OPPORTUNITIES FUND II, LLC,	:
	No. 10 Civ. 3970 (TPG)
Plaintiffs,	:
	:
- against -	:
	:
THE REPUBLIC OF ARGENTINA,	:
	:
Defendant.	:
-----X :	
BLUE ANGEL CAPITAL I LLC,	:
	:
Plaintiff,	No. 10 Civ. 4101 (TPG)
	:
- against -	:
	:
THE REPUBLIC OF ARGENTINA,	:
	:
Defendant.	:
-----X :	

-----X :	
BLUE ANGEL CAPITAL I LLC,	:
	:
Plaintiff,	:
	:
- against -	:
	:
THE REPUBLIC OF ARGENTINA,	:
	:
Defendant.	:
	:
-----X :	
AURELIUS CAPITAL MASTER, LTD., and	:
AURELIUS OPPORTUNITIES FUND II, LLC,	:
	:
Plaintiffs,	:
	:
- against -	:
	:
THE REPUBLIC OF ARGENTINA,	:
	:
Defendant.	:
-----X :	

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Daniel B. Rapport, dated August 8, 2011 (“Rapport Declaration”), and the exhibits annexed thereto; the accompanying Memorandum of Law in Support of Plaintiffs’ Motion for Expedited Discovery from the Republic and BCRA, dated August 8, 2011; and all other pleadings and proceedings in these actions, the undersigned will move before the Honorable Thomas P. Griesa, United States District Judge for the Southern District of New York, at the United States Courthouse, 500 Pearl Street, Courtroom 26B, New York, New York 10007, on August 18, 2011, at 9:30 a.m. or as soon thereafter as counsel may be heard, for an order pursuant to Rules 26 and 69 of the Federal Rules of Civil Procedure and Sections 5223 and 6220 of the New York Civil Practice Law and Rules, for an order directing that the Republic of Argentina and Banco Central de la

Republica Argentina comply with the Plaintiffs' discovery requests as set forth in Exhibits C, D, and E of the Rapport Declaration, and for such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to S.D.N.Y. Local Civil Rule 6.1(a), opposing affidavits and answering memoranda of law, if any, shall be served within seven days after the service hereof, and reply affidavits and reply memoranda of law, if any, shall be served within two days after service of the answering papers.

Dated: New York, New York
August 8, 2011

FRIEDMAN KAPLAN SEILER
& ADELMAN LLP

By: /s/ Edward A. Friedman
Edward A. Friedman
Daniel B. Rapport
Emily A. Stubbs
Jeffrey C. Fourmaux

7 Times Square
New York, New York 10036
Telephone: (212) 833-1100

Attorneys for Plaintiffs